

EXHIBIT A-4

From: Dilip Jana <janadilip@gmail.com>
Sent: Wednesday, June 25, 2025 10:02 AM
To: Jones, Morgan (Assoc-DAL-LT)
Cc: Wahby, Peter (Shld-Dal-LT); Hampton, Holmes (Assoc-DAL-LT)
Subject: Re: Case 4:24-cv-00698-SDJ-BD: Link for the Impeached audio EXHIBIT F-2.m4a [Jana v Walmart]

Dear Ms. Jones,

Thank you for your message regarding the case citations included in Plaintiff's recent filing. I appreciate your diligence and agree that accuracy in the record is essential.

The citations in question were based on legal research tools available to me at the time. Upon further review, it appears that one or more of the cases may reference unpublished, sealed, or potentially misattributed decisions not readily accessible through standard public databases such as Westlaw or PACER.

To avoid any confusion, I am in the process of reviewing alternative authorities and will submit corrected or supplemental citations if the Court requests clarification. That said, the legal principles supported by those citations are well-established and are already reinforced by multiple controlling precedents in both the Fifth Circuit and the Eastern District of Texas.

For clarity:

1. **Evans v. Hood, No. 3:17-CV-00015** was cited in ¶16 of the filing. Paragraph 17 further supports the same legal principle with five additional authorities.
2. **Walton v. Montgomery Cty. Hosp. Dist., 2021 WL 5417773** appears in ¶27, which also includes multiple additional cases substantiating the same legal point.
3. **O'Neal v. Cazares, No. 3:20-CV-1963-D** is cited in ¶31. As an updated and more recent authority on the same issue, I have already submitted *U.S. Bank N.A. v. Lindsey*, No. 4:22-cv-03499 (S.D. Tex. 2025) in Dkt. 62.

If your team is aware of any contrary authority that directly refutes the propositions set forth in those paragraphs, I welcome its inclusion in the record.

Respectfully,
Dr. Dilip Jana

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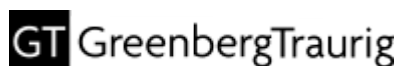
On Tue, Jun 24, 2025 at 5:39 PM <Morgan.Jones@gtlaw.com> wrote:

Dilip --- Could you please provide us with the correct citations to the following cases cited in your Response? We cannot locate these cases on Westlaw or on the courts' dockets.

- Evans v. Hood, No. 3:17-CV-00015, 2018 WL 4517614, at *4 (S.D. Tex. Sept. 20, 2018)
- Walton v. Montgomery Cty. Hosp. Dist., 2021 WL 5417773, at *2 (E.D. Tex. Nov. 19, 2021)
- O'Neal v. Cazares, No. 3:20-CV-1963-D, 2021 WL 4243390, at *3 (N.D. Tex. Sept. 17, 2021)

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From: Jones, Morgan (Assoc-DAL-LT)

Sent: Thursday, June 19, 2025 4:24 PM

To: Dilip Jana <janadilip@gmail.com>; Wahby, Peter (Shld-Dal-LT) <Peter.Wahby@gtlaw.com>; Hampton, Holmes (Assoc-DAL-LT) <Holmes.Hampton@gtlaw.com>

Subject: RE: Case 4:24-cv-00698-SDJ-BD: Link for the Impeached audio EXHIBIT F-2.m4a [Jana v Walmart]

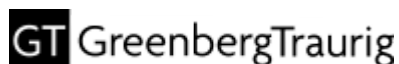
Received. Thank you, Dilip. We noticed you stated in your filing yesterday that Walmart has not provided initial disclosures or produced documents. As a reminder, Walmart's initial disclosures were emailed to you on April 7th and Walmart's first production was emailed to you on June 9th. If you are unable to locate these emails in your inbox, please let us know and we can forward them to you.

Also, as noted in the file transfer email itself, the download link for Walmart's production expires today (6/19). Our firm's file transfer system does not allow download links to remain active indefinitely. We

understand from your letter dated June 10th that you object to Walmart's production and, accordingly, have not yet accessed the materials. If you change your mind and later decide you want to review the production, please let us know, and we will be happy to provide you with a new download link.

Morgan Jones
Associate

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From: Dilip Jana <janadilip@gmail.com>
Sent: Thursday, June 19, 2025 8:06 AM
To: Wahby, Peter (Shld-Dal-LT) <Peter.Wahby@gtlaw.com>; Jones, Morgan (Assoc-DAL-LT) <Morgan.Jones@gtlaw.com>; Hampton, Holmes (Assoc-DAL-LT) <Holmes.Hampton@gtlaw.com>
Subject: Case 4:24-cv-00698-SDJ-BD: Link for the Impeached audio EXHIBIT F-2.m4a

EXTERNAL TO GT

Dear Counsels:

Here is the link for the impeached audio (EXHIBIT F-2.m4a) that I submitted yesterday.

https://drive.google.com/drive/folders/1dxCOvALuFbq_k1rKAUqxR3rPtMXKk1AH?usp=sharing

Kind regards,

Dr. Dilip Jana

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Thanks

Dilip